

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 11 Civ. 5449 (JGK)

INDUSTRIAS DE PAPEL R. RAMENZONI, S.A.,
a foreign corporation,

Plaintiff,

vs.

CREDIT SUISSE FIRST BOSTON, et al.,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO BRIEF THE COURT ON ITS INQUIRY
REGARDING DIVERSITY JURISDICTION**

COMES NOW, the Plaintiff, INDUSTRIAS DE PAPEL R. RAMENZONI, S.A., (hereinafter referred to as "Plaintiff"), by and through its undersigned counsel, and respectfully requests leave to brief the Court on its inquiry (D.E. 3) regarding diversity jurisdiction, and in support thereof states the following:

1. This case is premised on the sale of fraudulent or non-existent Argentinean Global Bonds which resulted in billions of dollars of loss to the Plaintiff.
2. The fraud was perpetrated by Credit Suisse as successor to Banco de Investimentos Garantia, S.A. (Brazil).
3. Credit Suisse is a global banking institution, in existence for more than 150 years, with hundreds, if not thousands, of affiliate corporate entities throughout the United States and the world.

4. As a result of the vast number of corporate entities incorporated by and affiliated with Credit Suisse – some of which have undergone name changes through the years, and upon information and belief, Plaintiff has named the defendants believed to be responsible for Plaintiff's losses.

5. The named defendants are also believed to possess the required characteristics to establish diversity jurisdiction.

6. However, in light of the Court's inquiry regarding diversity jurisdiction, and Credit Suisse's recent filing challenging diversity (D.E. 4), Plaintiff respectfully requests an opportunity to brief the Court on the issue of diversity jurisdiction.

7. In light of the fact-specific nature of the information believed to be relevant to Plaintiff's response, Plaintiff respectfully requests twenty (20) days to investigate this matter further and file its brief concerning diversity jurisdiction.

WHEREFORE, the Plaintiff, INDUSTRIAS DE PAPEL R. RAMENZONI, S.A., respectfully moves for leave to brief the Court on the issue of diversity jurisdiction.

Respectfully submitted,
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